



VIRGINIA
& AMBINDER LLP
A t t o r n e y s a t L a w

40 Broad Street, 7th Floor
New York, NY 10004
Telephone: (212) 943-9080

Julie Dabrowski
Associate
jdabrowski@vandallp.com

September 29, 2017

VIA ECF

Honorable Judge Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Trustees of the Plumbers Local Union No. 1 Welfare Fund, et al. v.
Mericore Concrete Cutting, Inc., 17 Civ. 05114**

Dear Judge Cogan:

This firm represents the plaintiff trustees in the above-referenced matter. We write to request that the Court adjourn the initial conference scheduled for October 12, 2017. This is Plaintiffs' first request for adjournment of the initial conference.

Plaintiffs commenced this action on August 30, 2017, seeking contributions owed pursuant to an audit of Defendant's books and records performed earlier this year. Defendant was served with the summons and complaint on August 31, 2017. Plaintiffs subsequently provided Defendant an extension until November 1, 2017 to respond to the complaint.

Plaintiffs have permitted Defendant to submit documentation that will enable Plaintiffs' auditors to perform a revised audit. The parties hope to reach a settlement of this matter based on the amounts revealed by the audit. Accordingly, Plaintiffs request that the initial conference be adjourned to allow time for the audit to be completed. Plaintiffs request that the conference be rescheduled for November 7, 2017, or November 8, 2017, or another date that is convenient for this Court. Should the parties reach a resolution of this matter in the interim, Plaintiffs will inform the Court of same.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/
Julie Dabrowski